

Chapter 5 – Response to Comments

consulting
education
clinical practice

Infectious Disease Specialists, PC
George F. Risi MD, FACP
Fellow, Infectious Disease Society of America

Valerie Nottingham
National Institutes of Health
B13/2W64
9000 Rockville Pike
Bethesda, Maryland
20892

02-02-04P03:24 RCVD

Comment to: Supplemental Draft Environmental Impact Statement
RML Integrated Research Facility

January 22, 2004

Dear Ms. Nottingham,

This letter is to reaffirm my support for the construction of the integrated research facility that has been proposed for the campus of the Rocky Mountain Laboratories (RML) located in Hamilton, Montana.

Previously I wrote in support of the initiative after review of the Draft Environmental Impact Statement (DEIS) issued in May of 2003. As the result of input received during the public comment period a supplemental DEIS was composed and released in December 2003. That supplement contains additional information specifically addressing, among other things, the safety record at the major biosafety level 4 (BSL-4) facilities around the world, as well as a maximum possible risk (MPR) analysis assuming catastrophic failure of the multiple safeguards built into the facility. Both of those analyses should go a long way toward assuaging any concerns that individuals have expressed. This is because there were no clinical infections of workers in these labs (3 institutions which over 30 years amassed nearly 500,000 hours of laboratory and field work working with such agents as Ebola, Marburg and other hemorrhagic fever viruses) and there is no measurable risk to the community at large in any of the worst case scenarios investigated in the MPR analysis.

It bears repeating that RML's proposed facility would be the premiere research facility of its kind in the world when completed. It would be an economic boon to the area and could indeed serve as a magnet for other private research facilities. The potential benefits to the local medical community are also enormous, as part of the proposal is the education of local health care providers on the management of potentially exposed individuals and the upgrading of local hospitals to accommodate such persons were an exposure to occur. Such training and facilities upgrades will greatly assist us in our ability to deal with the much more likely possibility of infection in a traveler returning from areas of the world where such emerging infectious diseases are found (SARS in China, Ebola in Africa, Junin in Argentina, to name just a few) as well as with any potential biologic attack on our community.

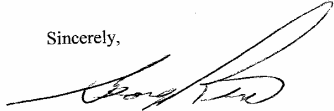
The supplemental draft EIS is a comprehensive document that more than adequately, in my assessment, evaluates the overall impacts on the community of the

LETTER 21 - DR. GEORGE RISI

544 W. Broadway, Missoula, MT 59802 risi@saintpatrick.org phone 406-327-1666 fax 406-329-5606

construction of the facility. I concur with its conclusions and encourage the final report to continue to consider the proposed construction as the preferred alternative.

Sincerely,



George F. Risi, MD, FACP, FIDSA
Director, Infection Control
St. Patrick Hospital and Health Sciences Center

Montana State Senate



The Big Sky Country

SENATOR RICK LAIBLE
SENATE DISTRICT 30

HELENA ADDRESS:
PO BOX 200500
HELENA, MONTANA 59620-0500
(406) 444-4800

HOME ADDRESS:
529 MOOSE HOLLOW
VICTOR, MONTANA 59875
PHONE: (406) 961-8974
FAX: (406) 961-8975
E-MAIL: ricklaible@aol.com

COMMITTEES:
FINANCE
LOCAL GOVERNMENT
NATURAL RESOURCES

January 22, 2004

Valerie Nottingham
National Institute of Health
B13/2W64, 9000 Rockville Pike
Bethesda, Md. 20892

Re: Rocky Mountain Lab-Hamilton, Mt.

Dear Ms. Nottingham:

Having reviewed the Supplemental Draft Environmental Impact Statement, dated December 2003, for the above project it is quite evident that the safety of the community was of primary concern during the design of the project. The safety record of all Level 4 labs is impeccable and poses virtually and statistically very little threat to the community.

Our current county growth policy, created by a bipartisan community focus group, overwhelmingly supported section 3.6, Economic Development, by boldly highlighting the following beginning statement. "The intent of this countywide goal (economic development) is to promote and encourage a positive environment for existing and new businesses. It proposes a means to evaluate current public needs to improve the business environment in the County. Other collaborative efforts to support businesses are also proposed."

There are some within our community whose primary goal is to stop all growth which is from whom the majority of the opposition is coming. This is not about the safety of the Lab, but the jobs and population growth which the Lab will bring.

I strongly support, and so does the majority of our community, the expansion of the Rocky Mountain Laboratories in Hamilton.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rick Laible".
Rick Laible

02-02-04P03:23 RCVD

*LETTER 22 - STATE SENATOR RICK
LAIBLE*

LETTER 23 - ANONYMOUS

02-02-04P03:23 RCV0

Commenting on the proposed Lab in Hamilton, MT

January 24, 2004

We reside within a few miles of the proposed lab in Hamilton, MT and we are against the proposed building! We want to make it clear that we do not want it built! We don't feel that the potential gain is worth the almost certain catastrophe that will happen someday if the lab is built – harboring deadly viruses, bacteria, etc.

Arguments can be argued forever, but the bottom line is that this is in our back yard and we do not want it at all! Why can't you understand that someday a catastrophic mistake will happen if the lab is built? You're dealing with humans here. People can't be perfect forever. Sooner or later, a mistake will be let out. Intentional or unintentional – it will happen. Do you really think that there never will be a major mistake?

We can't even believe that you would consider building such a place. We could care less about the few jobs that would be created. We don't want growth any more. Pretty soon the beautiful place that drew us here will all be developed and then what will we do? Forget the lab – forget more growth – let things stay the same.

Sincerely,

A Hamilton, Montana Area Family

LETTER 24 - ANONYMOUS

02-02-04P03:23 RCVD

02-02-04P03:23 RCVD

1/24/04

Regarding the proposal of building a BSL-4
lab in our neighborhood -

We are residents in the Hamilton, mt area
and we are 100% against building such a lab!

We don't want the lab in our area at all.

It all is made to sound as it is ok and safe,
but eventually someone, sometime will error and
then it's too late. Then people will say "we
never should have built it!"

If it must be built, build it on government
lands in the desert somewhere.

Sincerely,

A Hamilton Area Family

Citizen comments on RML SDEIS

02-02-04 10:02 AM

25-1 { I have attended numerous information meetings with RML management, and the same questions remain unanswered. One has to wonder if this is a deliberate attempt by the NIH to deceive the citizens of Hamilton. It has been our understanding, all along, that in 2001, President Bush mandated new and expanded research on biological weapons that could be used by terrorists after 9/11. That mandate became the reason for the proposed BSL-4 expansion at RML. Yet, on Jan. 22, 2004, Dr. Bloom stated (to approx. 125 Hamilton citizens), that there would be "NO BIOLOGICAL WEAPONS RESEARCH AT RML". What, then, is the reason for the proposed BSL-4 expansion? What, then, is the reason to put the citizens in harm's way? And I'm sure that the U.S. inability to find biological weapons in Iraq isn't helping the NIH case either. There doesn't seem to be any acceptable reason to bring these deadly pathogens into our community.

And what about the terrorists? Any suicide bomber with bio weapons and an airplane is certainly concerned that an antidote or vaccine could be discovered at RML, that would counteract his weapon. Logic says that it would be in the terrorists' best interest to destroy the BSL-4 facility, and stop the research. But where does that leave us, the neighbors to RML? Are we nothing more than collateral damage in the eyes of the NIH?

25-2 { And finally, it would have made the BSL-4 Lab much easier to accept if the NIH had spent a portion of their HUGE budget to improve the City of Hamilton. To my knowledge, the RML never even offered to pay the balance of what they owe on their enormous water bill, much less take the burden off the local taxpayers to improve the water and sewer systems to accommodate the Lab's ever-expanding needs. As a result, the citizens of Hamilton have some of the highest water rates in the State of Montana. We resent being required to subsidize the Federal Government while the officials at RML and NIH get large bonuses. How about providing us with a new fire truck, or an isolation room at the hospital, etc??? You need to pay for the impact you are making here. Our new City Councilors are much more able and competent to negotiate these things than the previous Council, and you should ask for their suggestions. I doubt your BSL-4 will ever be welcome here if you continue to burden the citizens.

Lorraine Crotty, 1000 S. 2nd Street, Hamilton, MT 59840

LETTER 25 - LORRAINE CROTTY

Comment

Response

25-1

Please see the purpose and need stated on page I-5 of the FEIS. This information was provided in the DEIS and the SDEIS.

25-2

Please see page I-11 where this comment is addressed. The NIH is restricted by Federal law from paying for the listed items absent specific authority to do so, and the NIH has no such authority.

Valerie Nottingham
National Institutes of Health
B13/2W64
9000 Rockville Pike
Bethesda, Maryland
20892

02-02-04P03:22 KCV0

LETTER 26 - 28 DOCTORS

Comment to: Supplemental Draft Environmental Impact Statement
RML Integrated Research Facility

January 22, 2004

Dear Ms. Nottingham,

This letter is to reaffirm our support for the construction of the integrated research facility that has been proposed for the campus of the Rocky Mountain Laboratories (RML) located in Hamilton, Montana.

Previously we wrote in support of the initiative after review of the Draft Environmental Impact Statement (DEIS) issued in May of 2003. As the result of input received during the public comment period a supplemental DEIS was composed and released in December 2003. That supplement contains additional information specifically addressing, among other things, the safety record at the major biosafety level 4 (BSL-4) facilities around the world, as well as a maximum possible risk (MPR) analysis assuming catastrophic failure of the multiple safeguards built into the facility. Both of those analyses should go a long way toward assuaging any concerns that individuals have expressed. This is because there were no clinical infections of workers in these labs (3 institutions which over 30 years amassed nearly 500,000 hours of laboratory and field work working with such agents as Ebola, Marburg and other hemorrhagic fever viruses) and there is no measurable risk to the community at large in any of the worst case scenarios investigated in the MPR analysis.

It bears repeating that RML's proposed facility would be the premiere research facility of its kind in the world when completed. It would be an economic boon to the area and could indeed serve as a magnet for other private research facilities. The potential benefits to the local medical community are also enormous, as part of the proposal is the education of local health care providers on the management of potentially exposed individuals and the upgrading of local hospitals to accommodate such persons were an exposure to occur. Such training and facilities upgrades will greatly assist us in our ability to deal with the much more likely possibility of infection in a traveler returning from areas of the world where such emerging infectious diseases are found (SARS in China, Ebola in Africa, Junin in Argentina, to name just a few) as well as with any potential biologic attack on our community.

The supplemental draft EIS is a comprehensive document that more than adequately, in our assessment, evaluates the overall impacts on the community of the construction of the facility. We concur with its conclusions and encourage the final report to continue to consider the proposed construction as the preferred alternative.

Undersigned

11/11/11

Le 8 sept 1885

Signature Legend

Tom McMahon, MD	Lar Autio, MD
<i>Vascular Surgeon</i>	<i>Family Medicine</i>
John T. Lakatua, MD	Peter Szekely, MD
<i>Nephrology</i>	<i>Internal Medicine</i>
Howard Chandler, MD	Eric Hughson, MD
<i>Neurosurgeon</i>	<i>Internal Medicine</i>
<i>Montana Neurological Associates</i>	Douglas Webber, MD
Phil Gardner, MD	<i>Emergency Medicine</i>
<i>Otorhinolaryngology</i>	William Bekemeyer, MD
Charles Swannack, MD	<i>Pulmonary/Critical Care Medicine</i>
<i>Vascular Surgeon</i>	<i>Director, ICU, St Patrick Hospital</i>
Paul Loehnen, MD	Jeffrey Haller, MD
<i>Pulmonary/Critical Care Medicine</i>	<i>Otorhinolaryngology</i>
Lou Kattine, MD	Chris Mack, MD
<i>Vascular Surgery</i>	<i>Neurosurgery</i>
Michael Curtis, MD	T. Shull Lemire, MD
<i>Internal Medicine</i>	<i>Pulmonary/Critical Care Medicine</i>
Margaret Eddy, MD	<i>Director, ICU, Community Hospital</i>
<i>Nephrology</i>	Beth Thompson, MD
Phil Roper, MD	<i>Internal Medicine</i>
<i>Cardiology</i>	Tim Donovan, MD
Herb Swick, MD	<i>Emergency Medicine</i>
<i>Director, Institute of Medicine and Humanities</i>	Joe Weydt, MD
Greg Kazemi, MD	<i>Emergency Medicine</i>
<i>Emergency Medicine</i>	Warren Guffin, MD
Steven Johnson, MD	<i>Director, Emergency Medicine</i>
<i>Neurology</i>	<i>St Patrick Hospital</i>
Stan Seagraves, MD	Les Whitney, MD
<i>Internal Medicine</i>	<i>Infectious Diseases</i>
C. Carter Beck, MD	<i>Director, Infection Control</i>
<i>Neurosurgeon</i>	<i>Community Hospital</i>
Richard Selman, MD	
<i>Pulmonary/Critical Care Medicine</i>	

02-02-04P03:21 RCVD

January 22, 2004

NIH, B13/2w64
9000 Rockville Pike
Bethesda, MD 20892

We oppose building a Bk-4 lab in our community of Hamilton, Montana. We live 4 miles out of town but the threat of an accidental leak of dangerous pathogens to the people of the town and surrounding area is unacceptable. More importantly the threat of terrorists attempting to steal pathogens from this lab is even more dangerous.

Hamilton and Ravalli County do not have the police force nor expertise to combat terrorists. A lab handling such dangerous pathogens should be located in a remote desert area with proper military protection from terrorist threats. The INEL lab in Southern Idaho comes to mind as a more suitable location. Sincerely,

Ed Bloedel
574 Harvey Lane
Cornell's MT 59823

Gwen Bloedel
574 Harvey Ln
Cornell's, MT.
59828

LETTER 27 - ED AND GWEN BLOEDEL

Comment

Response

27-1

Please see response to comment 10-1.

January 21, 2004

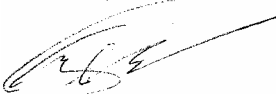
Valerie Nottingham
NIH, B13/2W64
9000 Rockville Pike
Bethesda, MD 20892

Re: Comment on the Supplemental Draft Environmental Impact Statement
Concerning the upgrade of the RML to a Level 4 facility

To Ms. Nottingham:

Enclosed is a letter I sent to the Hamilton City Council, the Mayor and to the local paper, Ravalli Republic in reaction to my deep concern for the placement of such a facility in ANY residential community!

Sincerely,



Cooper Neville
HEIRLOOM OIL PORTRAITURE
220 Fairgrounds Rd.
Hamilton, MT 59840

LETTER 28 - COOPER NEVILLE

02-02-04P03:21 RCD

January 15, 2004

Hamilton City Council and the Mayor
City of Hamilton
223 South Second St
Hamilton, MT 59840

Firstly: The Mission Statement for the City of Hamilton Montana...
“Provide for the Public Health and Safety and promote the Economic
Prosperity and Environmental well-being of its citizens” Hamilton City
Council

To the Hamilton City Council and the Mayor of Hamilton:

Welcome Tom Peterson, Bob Scott, and Robert Sutherland as the new
additions to our city council! May the New Year reflect a refreshed clarity
resulting in a healthy dialog in regard to fully comprehending the long-term
impact of the former Council’s agreeing and supporting the upgrade of the
Rocky Mountain Lab to a Level 4 status.

The new Supplemental Draft Environmental Impact Statement addressing
this upgrade in our residential community is now available for review.
Please read this document and notice the vagueness concerning any ‘what if’
error scenarios and the impact on the local citizenry...(us!)

28-1 { I request that the Council hold the Federal Government via the NIH
accountable to clarify for us in detail how we, as a community and as
individuals will be compensated and protected in case there is a consequence
of human error resulting in illness or death.

28-2 { If we, as a community accept this dangerous facility in our neighborhood we
want a detailed, legal commitment of being fully educated as to the effect an
accident would have on our ground water, air, soil, and of course our
individual persons.

Comment

Response

28-1

Please see where this comment is addressed
in Section 1.7.3 of the SDEIS. In the event
that any property damage, personal injury, or
death results from the negligent act or
omission of a Federal employee acting in the
scope of the employee’s official duties, a claim
for compensation may be filed in accordance
with the Federal Tort Claims Act, 28 U.S.C.
2671-2680.

28-2

Please see where this comment is addressed
in Section 1.7.3 of the SDEIS. Please see
response to comment 28-1. The Hamilton
City Council has no authority to legally bind
the NIH to the requested commitments.

28-3 { Also, and most importantly, I ask the Council to hold the NIH legally and financially responsible to provide all services needed for a mop-up and to insure again via a Legal Binding Commitment full protection and compensation for all individuals negatively impacted physically, psychologically, or financially because of a lack of containment by a releasing of pathogens.

Let us utilize the deductive process of reasoning by being thorough in our understanding of a full disclosure of ALL VARIABLES concerning this endeavor and all the possible consequences.

Sincerely,

Cooper Neville
Heirloom Oil Portraiture
229 Fairgrounds Rd.
Hamilton, MT 59840

Comment

Response

28-3

Please see where this comment is addressed in Section 1.7.3 of the SDEIS.

January 22, 2004

NIH
B13/2W64
9000 Rockville Pike
Bethesda, Md. 20892

To Whom It May Concern:

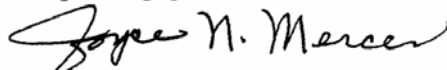
I am opposed to the proposed expansion at Rocky Mountain Laboratories that includes a high containment biological lab.

Frankly, I'm very frightened about a level 4 lab operating in our small community of Hamilton. I have suffered with anxiety over this possibility for months.

I doubt the majority of Hamilton citizens would vote in favor of such a facility being built here if given that choice. Alas, we don't have that opportunity. I don't trust the government making these choices for me. I have a hunch most of the residents of Hamilton feel the same way.

29-1 { I suggest that before you make a decision on the construction of a level 4 lab here that you contract for a professionally conducted public opinion poll that will give you necessary information to make an informed decision. This could be done fairly quickly by working with the University of Montana, and it shouldn't be too expensive.

Very truly yours,



Joyce N. Mercer
711 N. 2nd Street
Hamilton, MT 59840

PH (406) 363-6416

LETTER 29 - JOYCE MERCER

Comment

Response

29-1

Public comment will be considered in the decision.

030

LETTER 30 - DALE HUHTANEN

2441 Old Darby Road
Hamilton, MT 59840-9793
January 30, 2004

Valerie Nottingham,
National Institute of Health
B13/2W64
9000 Rockville Pike
Bethesda, MD 20892

Ref: Comments to Supplemental Draft EIS
for RML-Integrated Research Facility

Dear Ms. Nottingham:

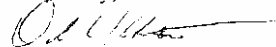
This letter is written as a matter of record regarding my support for the construction of the Integrated Research Facility at RML in Hamilton, MT. I have read both the draft and supplemental draft EIS and continue with my support for the building of such a facility at RML in Hamilton, MT.

As a resident of Ravalli County and as supporter of economic growth and activity in the Bitterroot, I endorse both the construction of the facility and the hiring of the additional 100 plus employees to operate the facility. The estimated construction wages of \$5 million and the additional annual salaries of \$6.5 million are direct benefits to the City of Hamilton, Ravalli County, and the State of Montana. Also, benefits to each listed agency are increased with additional property taxes, additional payroll taxes, and the economic multiplier regarding the dollars circulated or created by these activities. The construction of this facility and the additional employees will provide an economic stability for the government agencies, to include the City of Hamilton, Ravalli County, and the State of Montana.

I also do not believe that the safety issue or questions raised by others are a risk factor to either the city or county residents. RML has an excellent safety record that negates this issue.

Thank you for allowing me to comment on the supplemental draft EIS.

Yours truly,



Dale E. Huhtanen

Chapter 5 – Response to Comments

0319

- 31-2 { .PROBLEMS: No attention is given to possible research benefits that an entirely new facility elsewhere might offer and no actual other location options have been positively explored. Data as to timeframes for upgrades to fulfill the need for BSL-4 at other NIH facilities should be given for comparison. IS THE 2 YEAR TIME FRAME FOR BSL 4 LAB BUILDING ONLY? DOES IT INCLUDE SECURITY UPGRADES (Will BSL-4 be operable without these in place?), VISITOR CENTER AND POWER PLANT?
- 31-3 { 3. Cost of 1 billion for a new facility compared with 66.5 million Congress has presently allocated.
- PROBLEMS: Because the SDEIS does not examine these alternatives with hard data, it is impossible to properly evaluate construction and community costs. However, if the decision to locate this project in Hamilton is in some measure economic this needs to be clarified. **The decision to save national funding by locating in Hamilton, at the expense of this one community, should be clearly admitted and funds should be committed, in the project budget, for compensation where mitigation is not possible.** It is not right to use the given Congressional appropriation figure as an excuse to sacrifice this one community.
- B. NEIGHBORHOOD PROBLEMS NOT MITIGATED
- 31-4 { 1. **Parking.** No employee parking space is shown outside the security perimeter in the planned design. This means that at high traffic times and at times of heightened security employees will be faced with delays at the guarded entrance and hazardous traffic blocking lines will result. In addition, to avoid these lines and delays employees will choose to park on the neighborhood streets and walk through security (As noted near the end of the section headed "Transportation," SDEIS page 4-15). **A large and convenient employee parking area outside the fenced security area is essential to minimize traffic and parking impacts on the neighborhood.**
2. **Noise**
- 31-5 { a. Noise duration from incineration is projected to increase one to two days per week.
b. Voluntary Noise Standard levels (55dBA) allow a constant audible industrial hum in the adjacent neighborhood.
c. The above standard would be in effect "during the daytime"(Section 4.4.1.1). In summer in western Montana, when neighbors are likely to be trying to enjoy their yards, daytime lasts from before 6 am to after 9 pm.

Comment	Response
31-2	Construction of the Proposed Action would be expected to take 2 years. The Proposed Action includes the Integrated Research Facility and boiler plant addition. See page 2-2. Please also see page 4-1 for a list of activities not related to the proposed action that will be accomplished at RML. The schedule for reasonably foreseeable action is currently unknown.
31-3	The decision is economic only in terms of potential economic harm (no harm was identified) and the money available to construct the facility.
31-4	Under another project the NIH is planning for unsecured parking outside of the fence as suggested.
31-5	Daytime hours are defined in the EIS (pgs. 2-8 and 3-9) as 7:00 am to 7:00 pm.

032

RML Integrated Research Facility

Public Meeting – January 22, 2004

Comments on the Supplemental Draft Environmental Impact Statement

1-27-04

- I am not against the lab, but I am against a level 4 lab in our City or any City that has NO protection from a terrorist attack. Most of the Citizens of Hamilton Mt. do not want a level 4 lab in our City limits, or any place in the Western part of Montana. The level 4 lab would be too close to schools, residential parks, play grounds and our most precious Bitterroot River. There is absolutely NO protection from terrorist that could fly airplanes from any where to this Western part of Montana. Noise from the lab and traffic using our residential streets would be terrible. We are also concerned about the method these deadly pathogens would be transported to the lab? Obviously, they would have to use our residential streets. What type of security would be available to protect our neighborhood from terrorist trying to stop a shipment from reaching the lab. The terrorist will do any thing they can to stop us from making a vaccine that will stop thier efforts to kill as many people as they can. A level 4 lab needs to be placed on or near a Military Base so it can be protected from any terrorist organization. There are NO Military Bases in Western Montana. NO Military planes or missels to protect us. NO nothing but a chain link fence and a few guards that would not be able to stop a truck loaded with TNT or a plane that is headed straight for the lab. IF you insist on putting a level 4 lab in our City then the lab should be responsible for ALL improvements associated with the lab such as the new water tank and system that the City has burdened us Citizens with. All City residents had our base water base doubled last year to help pay for the new system that the lab will benefit from. The lab should have to pay for all street maintenance going to and from the lab. Put a isolation ward in our Hospital and be responsible for sewer improvements and maintenance. Our cost of living will go out of sight. There are a lot of long time residents senior citizens and retired people living here who will NOT benefit from the lab. The only ones that want the lab here are the ones that will benefit most from it. Construction of the new lab might keep a few contractors in work but after it is built, then what? Where will the jobs be? Many good points were made at the Jan. 22, 2004 meeting of why people do NOT want a level 4 lab here please take them into consideration. I am almost 76 yearsold. I do not want to live the rest of my life in fear.

Name:

Company/Organization:

Address:

City, State, Zip:

Please send comments to: Valerie Nottingham

NIH. B13/2W64
9000 Rockville Pike
Bethesda, MD 20892

Please note that this document will become
part of the administrative record for the EIS
and will be subject to public review.

Comments must be post marked by February 11, 2004

LETTER 32 - ELEANOR PROSSER

Comment

Response

- 32-1** Please see page I-11 where this comment is addressed.
- 32-2** Please see Section I.7.3 where this type of comment is addressed.
- 32-3** Please see the discussions under Security in Chapter 2 for the Proposed Action and No Action where NIH has established a satellite police force at RML. The police force will provide immediate response to any and all security related incidents and is currently working with local law enforcement and first response units to develop mutual response support agreements, regardless of the alternative selected.
- 32-4** Please see page I-11 where this comment is addressed.
- 32-5** Please see page I-11 where this comment is addressed.
- 32-6** Please see page I-11 where this comment is addressed.

Chapter 5 – Response to Comments

MONTANA ASSOCIATION OF COUNTIES

2715 Skyway Drive
Helena, MT 59602-1213
(406) 442-5209
Fax (406) 442-5238
e-mail: maco@maco.cog.mt.us

February 6, 2004

Valerie Nottingham
NIH, B13/2W64
9000 Rockville Pike
Bethesda, MD 20892

Dear Ms. Nottingham:

The Economic Development Committee of the Montana Association of Counties recently learned that the National Institute of Health is considering expansion of the Federal campus on the Rocky Mountain Laboratories of the National Institute of Allergy and Infectious Diseases in Hamilton, Montana. We understand the proposed expansion will consist of construction of an Integrated Research Facility that will house research laboratories, offices, conference rooms, animal facilities, and supporting infrastructure as well as a building that will house bio-safety level 4 research laboratories.

We understand the project will provide an infusion of approximately \$66 million into Montana's economy during the construction phase and will also add approximately \$6 million annually into the local economy during operation.

33-I

The Economic Development Committee offers our support for your project in the interest of national security and safety of all United States citizens. We ask that you implement measures so qualified Montana contractors and trades people can be utilized during the construction phase of the project and, whenever possible, to employee Montanans within the facility when it is operational. Montana's recent economic hardship is of continual concern to us and we recognize this project will increase the long-term commitment to the growth of our state's employment opportunities.

Sincerely,



Anita L. Varone, Chair

MACo

02-09-04P02:48 RCVD

LETTER 33 - ANITA VARONE, MONTANA ASSOCIATION OF COUNTIES

Comment

Response

33-I

Please see Section 1.7.2 where this comment is addressed.

*City of Hamilton**223 South Second Street
Hamilton, MT 59840*

034

*LETTER 34 - DALE HUHTANEN, CITY OF
HAMILTON*

January 30, 2004

Valerie Nottingham,
National Institute of Health
B13/2W64
9000 Rockville Pike
Bethesda, MD 20892

File: #2004-510
Ref: Comments to Supplemental Draft EIS for RML-Integrated Research
Facility

Dear Ms. Nottingham:

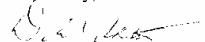
This letter is written as a follow-up to my initial letter dated June 24, 2003, regarding my support for the construction for the Integrated Research Facility at RML in Hamilton, MT. I have read both the draft and supplemental draft EIS and continue with my support for the building of such a facility at RML in Hamilton, MT.

As the Grants & Budgets Officer for the City of Hamilton I endorse both the construction of the facility and the hiring of the additional 100 plus employees to operate the facility. The estimated construction wages of \$4.7 million and the additional annual salaries of \$6.6 million are direct benefits to the City, Ravalli County, and the State of Montana. Also, benefits to each listed agency are increased with additional property taxes, additional payroll taxes, and the economic multiplier regarding the dollars circulated or created by these activities. The construction of this facility and the additional employees will provide an economic stability for the City of Hamilton, Ravalli County, and the State of Montana.

I also do not believe that the safety issue or questions raised by others are a risk factor to the city residents or myself. RML has an excellent safety record that negates this issue.

Thank you for allowing me to comment on the supplemental draft EIS and enter this letter as record.

Yours truly,


Dale E. Huhtanen
Grants & Budgets

Cc: file-City

Phone: 406-363-2101 - Fax: 406-363-0191
website: <http://www.cityofhamilton.net>

Chapter 5 – Response to Comments

035

2009 Old Ranch Rd.
Hamilton, MT 59840
January 29, 2004

To Whom It May Concern:

We live about 12 miles south of Hamilton and the proposed Level 4 lab at RML.

We have concerns about the potential danger such a facility would pose to our neighbors and friends who live close to the RML facility. RML is located in a developed residential community.

35-1 { Burning waste is currently an issue that has not been adequately addressed. What will be the impact of additional toxic waste incineration in such a densely populated neighborhood? Is the particulate matter a potential health hazard? Now? Then?

35-2 { If there was "an accident", what measures are in place to adequately deal with isolation and decontamination? Our local hospital and staff are hardly prepared for such an event. This needs to be addressed and a plan must be in effect. Federal money to support such a plan seems appropriate. Our medical facility cannot afford to institute such measures without financial assistance.

We fear that our community could become a target for terrorists if the Level 4 lab was developed here. At the present time, our community is rather benign and I doubt of much interest as a terrorist target. I fear that this will change.

I strongly object to the expansion proposed.

Thank you.

Carol Ann Hansen (Mrs. J.G.)

Carol Ann Hansen (Mrs. J.G.)

James C. Hansen MD
Director Emergency Dept.
Maui County Hospital

LETTER 35 - CAROL ANN HANSEN

Comment

Response

35-1 Please see Section 1.7.3 where this comment is addressed.

35-2 Please see Section 1.7.2 where this comment is addressed.

036

RML Integrated Research Facility

Public Meeting- January 22, 2004

**Comments on the Supplemental Draft Environmental Impact
Statement**

I would like to comment about the proposed expansion of the RML BSL-4. Having attended the meetings and listening to the public comments I have decided that the project should go forward, and the BSL-4 Lab should be constructed. My property is located next to the lab on the Southwest corner. My concern is that of noise. At the present time a patrol vehicle (gas powered golfcart type) passes by my property during the night time hours, usually at 10:30PM, 12:30AM, 2:30AM and 4:30 AM. This can make trying to sleep a problem, especially during the summer, when windows are open. There are ways to reduce this noise problem. Perhaps an electric vehicle, rather than gas powered, would be one solution. Even better than that would be to install in-fer red cameras, which could be monitored from a remote location inside the building. These measures would help with reducing the noise levels for all of those who live along the property lines next to RML. The EIS reviewed noise levels, except that none were done next to my property at location # 6 (SDEIS page 3-9 Figure 3-1) during the hours from 7:00PM to 7:00AM. How can the EIS state that noise levels were within guidelines, when none were taken during those hours? Only 4 out of 13 locations were monitored during nighttime hours.(SDEIS page 3-9 Table 3-8) I hope that these concerns will be considered during the review of the Supplemental Draft EIS.

Name: *Sheryl West*
Address: 719 Loma Ln
City, State, Zip: Hamilton, MT 59840 2013

LETTER 36 - SHERYL WEST

Comment

Response

36-1

Adjustments in operation of this vehicle are outside the scope of this EIS.

36-2

Noise generation can be determined based on the operation of various pieces of equipment. When these pieces are not in operation (such as the incinerator and emergency power generator) they are not producing noise. As stated in the DEIS, SDEIS and FEIS, noise reduction equipment has been installed since the monitoring was done (see FEIS pg. 3-9). New information on the effectiveness of the silencer has been included in the FEIS.

January 22, 2004

Valerie Nottingham
N.I.H. B13/2W64
9000 Rockville Pike
Bethesda MD, 20892

Dear Ms. Nottingham

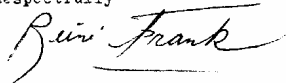
It has come to my attention that you are taking written comments and proposals on the environmental impact statement for a proposed expansion at Rocky Mountain Laboratories in Hamilton Montana. I am not certain what all these comments and proposals will be but I'm honored to put in my two cents worth.

First I'd like to point out that R.M.L. has been a plus to the community just from the standpoint of it's people who patronize the businesses of Hamilton and the surrounding area, not to mention the important scientific work that trickles down to the human race all over the world. When R.M.L. was first started in Hamilton, one consideration must have been space in relation to the density of the immediate population. At that time the population was just a fraction of what it is today. Hamilton Montana is located in Ravalli County and Ravalli County is the fastest growing county in the state of Montana. Since the National Institutes of Health announced it's intention to build a Biosafety Level 4 Lab in this ever growing populous area, I must frankly state, "you've got us shaking in our boots." I guess when people hear that pathogens like Ebola and the like are to be studied in our ever growing valley, concerns automatically run high. As just another common taxpayer I would ask that consideration be given to an area of less potential growth. I believe if this were done then security and safety measures could be addressed with far better success. After all, safety and security is what's on everyone's mind. I know it is easy for anyone to make a request and expect someone else to carry it out. This is not a burden I will leave unaddressed.

There is another county in western Montana that I believe addresses these issues far better than Ravalli Co., that County is Sanders Co. The town of Plains lies in the heart of Sanders Co., affords some of the mildest climate that Montana has to offer and has had very little population change in the last several years. Should consideration be given to putting this Level 4 lab elsewhere then I would also like to point out some other attributes to consider.

First, there is a 500 acre piece of land that lies in its own separate valley next to Plains with county road as property boundary on all four sides. This piece of property has about 1/4 of a mile of mountain stream on its western border and 3 of the 4 sides are paved county road. The property is out of sight of the town, yet is only 3 miles from the hospital. If the future calls for a scientific gated community with on campus housing for its staff, recreational potential on campus and future growth of the facility in general, then I believe this piece of property is worth considering. At any length the potentials here are unique and endless. If there is any possibility that this property would be put under consideration as a potential lab sight, I would gladly fill you in on any other details.

Respectfully



Reini Frank
803 Indian Prairie Loop
Victor Montana
59875

LETTER 37 - REINI FRANK

Comment

Response

37-1

37-1

Please see Section 2.2.2 that talks about other alternatives considered.

038

130 San Vicente Bl.
Santa Monica, Ca. 90402
February 1, 2004

To: Valerie Nottingham
NIH, B13/2W64
9000 Rockville Pike
Bethesda, Maryland 20892
From: C. Savage
Re: Dec. 2003 Supplemental Draft EIS for NIH, Rocky Mountain Laboratories, Hamilton, MT

Following Sept. 11, 2001 I would agree that increased biological research aimed at bioterrorist threats to our country is appropriate and necessary. The Supplemental DEIS, however, does not present a convincing argument that Hamilton, Montana is a suitable location for that research when the issues of protection from terrorist attacks and city infrastructure are considered. Clearly, the expansion of RML is economically advantageous for NIH, which undoubtedly is a driving force behind this proposal.

My initial concerns over the project were: 1) The community's ability to effectively deal with an extreme act of terror (law enforcement, fire and medical services), 2) Safe transportation of pathogens through the Bitterroot Valley in a heightened state of emergency, and 3) the increased load on the Water System in the city of Hamilton.

After reading this new draft I continue to have the same basic concerns:

First, let us consider **Risk Assessment**, which this draft addresses on two levels -- qualitative and quantitative. The qualitative assessment relies on a "literature review" of the last 20 years of BSL-3 and BSL-4 safety records. The quantitative assessment, as stated on page 4-11, "was driven by reasonably foreseeable, credible threat scenarios and addresses spills and work disruption; safety operations and potential failures and; fire."

I am reassured by the many safety precautions that are an integral part of Rocky Mountain Labs and agree that on that level, the facility is soundly constructed. However, when I think of risk these days, it is with the added threat of terrorism attached. Prior to Sept. 11th, the DEIS assessments might have seemed sufficient. Post 9/11/01, however, they are sorely lacking. The terror threat facing us now does not begin to compare to threats during those 20 years covered by the literature review. This document repeatedly dismisses perceived threats as "negligible." In the wake of 9/11 I would maintain that there is no such thing as a negligible threat. The 6 risk scenarios presented on pages 4-11 to 4-14 in no way compare to the devastation we all witnessed in New York. This draft does not present a scenario that depicts a massive terrorist act. On page 4-7 this draft states that "interviews with leaders of the local emergency response agencies indicate that community service providers have few, if any, concerns about their ability to respond quickly and adequately to any emergency that may arise at RML." When you see how metropolitan areas (Seattle, San Francisco, New York, Los Angeles, etc.) in our country respond to each heightened states of emergency (recent ORANGE terror alert status), how can you compare what the community services of the city of Hamilton could present in the way of protection? I think it is extremely naive not to assume that a BSL-4 facility that is proposed as a result of President Bush's call for more bioterrorist research would not itself be an inviting target for terrorists. I do not see that the level of protection that such a facility would warrant could be provided in the Bitterroot Valley with its current resources no matter how well-intentioned the protectors. Actually, I think that the current BSL-3 lab should have more protection than it does.

My concerns about transporting pathogens through the valley, whether by air or land vehicle

LETTER 38 - C. SAVAGE

Comment

Response

38-1 The literature review is based on past experience. The data has not changed since the review was done, and includes the time since 9/11/2001.

02-05-04A10:12 SCVD

38-1 {

Chapter 5 – Response to Comments

	<p style="text-align: right;">Q389</p>	
38-2 {	<p>result from the same terror issues. If RML suddenly becomes the receiver of pathogens that a terrorist could use, the town of Hamilton is placed at increased risk.</p> <p>Finally, with respect to the environment, I actually have many questions about air quality and the incinerator, waste water and the water supply, but I will focus on the latter. On page 4-27 the Draft states "Sixty percent of water produced by the (water) system is unaccounted for, leaking out of supply lines." How can a system with these problems take on new water demands? If the federal government (through NIH) requires Hamilton water, then it should bear part of the cost of shoring up the infrastructure.</p>	<p>Comment</p> <p>Response</p> <p>38-2 Please see page I-II where this comment is addressed.</p>
	<p>RECOMMENDATIONS IF THE PLAN PROCEEDS:</p>	
38-3 {	<p>1. Federally fund a fire and security force that is prepared to handle any possible terrorist threats directed at Rocky Mountain Lab or the surrounding community.</p>	<p>38-3 Please see Section I.7.3 where this comment is addressed.</p>
38-4 {	<p>2. Establish and publish in the community an Emergency Response Plan that states specifically what actions would be taken by whom in the event of various attacks of terror (including roles of police, fire, sheriff, highway patrol and medical facilities.)</p>	<p>38-4 Please see Section I.7.2 where this comment is addressed.</p>
38-5 {	<p>3. Specify what additions would be necessary for Marcus Daly Hospital to handle any emergency related to Rocky Mountain Lab -- including pathogen breaches or terrorist attack. Funding for these upgrades should be federal since the increased risk to the community is due to the President's request and the goals of a federal facility.</p>	<p>38-5 Please see page I-II where this comment is addressed.</p>
38-6 {	<p>4. Include in the federal budget all necessary funds to replace or repair inadequate water mains, pipes/sewer lines and roads in the city of Hamilton.</p>	<p>38-6 Please see page I-II where this comment is addressed.</p>
38-7 {	<p>The DEIS dismisses a variety of alternatives referring back to the purpose of the Proposed Action "to provide a highly contained and secure intramural laboratory at RML dedicated to studying the basic biology of agents of emerging and re-emerging diseases, ..." chosen for its "traditional strengths in the area of infectious disease research and the federal funding parameters associated with NIAID's intramural laboratory program..." With the purpose worded this way you can dismiss almost anything suggested by merely saying the budget doesn't allow it. I would counter with the suggestion that perhaps you reconsider what your budget will and will not allow.</p>	<p>38-7 Please see response to comment 31-3.</p>
	<p>I recently heard a terrorist strategist explaining that one of the government's strategies of fighting terrorism is to imagine what actions might cause the most upheaval and then take precautions to thwart such plans. If we start imagining what a terrorist group might do at or around RML, can we envision our community providing the kind of defense that would be needed? When I envision New York City on 9/11, I cannot see Hamilton, Mt. providing those resources. It may be the thinking of NIH that a somewhat rural setting with a lower population than an urban area is desirable for a research facility that might invite terrorist action. I would propose that a breach of security resulting from terrorism could result in pathogens being released not only in the surrounding area, but being transported out of Hamilton to who knows where.</p> <p>If the NIH budget won't permit expenditures that would make Hamilton better able to present appropriate defensive measures, then perhaps -- we, as a country, can't afford the facility in this location.</p>	